Exhibit G

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.	SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT SUCR2001-10384
Commonwealth	}
v.	
Leon Robinson	
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AFFIDAVIT OF TERENCE WRONG IN RESPONSE TO SUBPOENA OF AMERICAN BROADCASTING SYSTEMS, INC.

Terence Wrong deposes and says:

- My name is Terence Wrong. I am employed as a Senior Producer for American Broadcasting Companies, Inc. ("ABC"). I have been employed by ABC for approximately 18 years.
- 2. In 2001, I was the Executive Producer for the ABC series Boston 24/7. As Executive Producer, I was personally involved in the preparation and production of the Boston 24/7 series, including arrangements made with the City of Boston for a cameraman working for ABC to accompany members of the Boston Police Department and other law enforcement officials as they performed their official duties.
- 3. I have reviewed the subpoena addressed to American Broadcasting Systems, Inc. attached hereto as Exhibit A in order to determine if ABC has any documents responsive to the subpoena. Specifically, I was asked to locate (a) any and all film relating to the filming of 1587 Commonwealth Avenue, Boston, MA or

27 Spring Street, West Roxbury, MA, on either February 21 or 22, 2001; (b) any and all correspondence between ABC and the City of Boston, the Boston Police Department or the Suffolk County District Attorney's Office concerning the filming of 1587 Commonwealth Avenue, Boston, MA or 27 Spring Street, West Roxbury, MA, on either February 21 or 22, 2001 or concerning Leon Robinson; and (c) any correspondence between those same entities concerning a December 5, 2003 subpoena served on ABC (a copy of which I understand to be attached hereto as Exhibit B).

Case 1:04-cv-11023-RCL

- 4. ABC has no film or videotape of any filming of either 1587 Commonwealth Avenue, Boston, MA or 27 Spring Street, West Roxbury, MA, on either February 21 or 22, 2001. A Boston 24/7 cameraman named Dennis McCarthy did accompany Boston Police Department officers on or about February 21 and/or February 22, 2001 as they investigated the murder of a man in a Brighton barbershop. None of the footage ever was used in any ABC broadcast.
- 5. The last time I saw the videotapes taken of the Brighton murder investigation was when I put them in a suitcase of mine. I left the suitcase, with the videotapes inside, in a taxi cab in Boston. Neither the suitcase nor the videotapes (or any other contents of the suitcase) ever were recovered. My best memory is that I lost the suitcase at some point in the early months of 2001.
- 6. I do not recall hearing anything about the videotapes again until approximately December 2003 when I was advised that ABC had received a subpoena for the videotapes. I had lost the suitcase and the videotapes long before I learned of this subpoena. I informed ABC that I had lost the videotapes and that we had no other copies in our possession.
- 7. I am not aware of any correspondence between ABC and the City of Boston, the Boston Police Department or the Suffolk County District Attorney's Office concerning the filming of 1587 Commonwealth Avenue, Boston, MA or 27

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Filed 09/19/2005

Spring Street, West Roxbury, MA, on either February 21 or 22, 2001 or concerning Leon Robinson or the December 5, 2003 subpoena attached hereto as Exhibit B. ABC did sign a contract with the City of Boston concerning the filming of law enforcement activities for Boston 24/7, but I have not been able to locate a copy of that contract. I am not aware of, and do not have copies of any, correspondence between ABC and the City of Boston, the Boston Police Department or the Suffolk County District Attorney's Office concerning the matters stated above. If there were such correspondence, as Executive Producer of Boston 24/7 I believe I would be aware of it.

Signed under the penalties of perjury this 22nd day of February, 2005

Senior Producer

ABC, Inc.

Sworn to me this 22nd day February, 2005

Notary Public, State of New York Qualified in Bronx County Commission Expires April 11, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the Commonwealth and counsel for defendant by facsimile and first class mail on February 23, 2005.

Brandon L. Bigelow

Commonwealth of Massachusetts THE TRIAL COURT SUPERIOR COURT DEPARTMENT

SUFFOLK DIVISION

DOCKET #SUCR2001-10384

COMMONWEALTH,

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PLAINTIFF

SUBPOENA

LEON ROBINSON,

DEFENDANT

To: Keeper of Records
American Broadcasting Systems, Inc.
c/o Jonathan Albano, Esq.
Bingham McCutchen, LLP
150 Federal Street
Boston, MA 02210

GREETING.

YOU ARE HEREBY COMMANDED, in the name of the Commonwealth of Massachusetts to appear ON BEHALF OF THE DEFENDANT, before the Superior Court Department holden at 90 Devonshire Street, Courtroom 9, Boston, Ma, within and for the County of Suffolk, on Thursday, March 3, 2005, at 2:00 o'clock in the afternoon, and from day to day thereafter, until the action as aforesaid is heard by said Court, to give evidence of what you know relating to said action then and there to be heard and tried.

And you are further required to bring with you:

- 1. Any and all film relating to the filming of 1587 Commonwealth Avenue in Boston and 27 Spring Street, West Roxbury on February 21, 2001 and February 22, 2001.
- 2. Any and all correspondence, documents, memoranda between ABC and/or it's affiliates, including legal counsel to the Boston Police Department or Suffolk County District Attorneys Office regarding the filming of 1587 Commonwealth Avenue in Boston and 27 Spring Street, West Roxbury on Feburary 21, 2001 and February 22, 2001 or Leon Robinson.

 3. Any and all correspondence, documents, memoranda between ABC and/or it's affiliates, including legal counsel to the Boston Police Department or Suffolk County District Attorneys Office relating to a December 5, 2003 subpoena, which was served on ABC on same date.

HEREOF FAIL NOT, as you will answer your default under the pains and penalties in the law in that behalf made and provided.

Dated at: Boston, this 15th day of February, A.D. 2005.

Notary Public - Sheryle J. Meade

My Commission Expires: October 11, 2007

The commonwealth of Massacausetts

Suffolk ss.

AMERICAN Broad CASTING SELUCES

To: Keeper of the Records, or President Storen Borenstein, ABC 77 West 66th Street, NY, NY C/O CT Corporation, 101 Federal Street, Boston, MA 02110

You are hereby commanded, in the name of the Commonwealth of Massachusetts, to appear before the Suffolk Superior Court Department of the Trial Court holden at, 90 Devonshire Street, Boston, MA, 02109 within and for the county of Suffolk on the 8th day of December, 2003 at 2:00 o'clock in the AFTER noon, and from day to day thereafter, until the action hereinafter named is heard by said Court, to give evidence of what you know relating to an action of Criminal then and there to be heard and tried between Commonwealth Plaintiff, and Leon Robinson, 2001-10384 Defendant, you are further required to bring with you

Any and all documents and film relating to the filming of 24/7 show or other documentary or news program involving the Boston Police on February 21, and February 22, 2001. Also include any letters, correspondence, inter-office memos, etc. Report to the Magistrates Session located on the 9th floor of the courthouse. Contact attorney James Budreau for the defendant, upon receipt 617-227-3700.

This subpoena is issued at the request of the indigent defendant per Chapter 233, Sections One and Three.

Hereof fail not, as you will answer your default under the pains and penalties in the law in that behalf made and provided.

Pecember Dated at Methuen the \$5th day of November A.D. 2003.

Scott A. Keller - Notary Public

My Commission Expires 12-22-06